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Attorneys for WAYMO LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

UBER TECHNOLOGIES, INC.;
OTTOMOTTO LLC; OTTO TRUCKING
LLC,

Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF FELIPE
CORREDOR IN SUPPORT OF
DEFENDANT OTTO TRUCKING'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL PORTIONS OF ITS
RESPONSE TO PRECIS**

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
4 LLP, counsel for the Plaintiff Waymo LLC ("Waymo"). I have personal knowledge of the matters set
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Defendant Otto Trucking's Administrative Motion
7 to File Under Seal Portions of Its Response to Precis (the "Administrative Motion"). The
8 Administrative Motion seeks an order sealing highlighted portions of Otto Trucking's Response to
9 Waymo's Precis ("Otto Trucking's Response") and of Exhibits 2, 5, and 8 to the Vu Declaration, as
10 well as the entirety of Exhibits 3-4 and 6 to the Vu Declaration.

11 3. The portions of Otto Trucking's Response marked in red boxes, the green highlighted
12 portions of Exhibits 2 and 4, the entirety of Exhibit 6, and the yellow highlighted portions of Exhibit 8
13 contain or refer to confidential business information, which Waymo seeks to seal.

14 4. Otto Trucking's Response (portions marked in red boxes in version filed herewith),
15 Exhibit 4 (portions highlighted in green in version filed herewith), Exhibit 6 (entire document), and
16 Exhibit 8 (yellow highlighted portions) further contain, reference, and/or describe Waymo's highly
17 confidential and sensitive business information. Such information includes details regarding
18 Waymo's confidential strategy related to Anthony Levandowski's departure, executive compensation,
19 and Waymo's approach to LiDAR design. I understand that Waymo maintains that this information
20 as confidential. The public disclosure of this information would cause significant competitive harm to
21 Waymo, as its confidential business and technical strategy would become known to competitors who
22 could use such information to Waymo's disadvantage. In addition, Exhibit 4 (portions highlighted in
23 green in version filed herewith) contain email addresses and/or phone numbers of Waymo employees
24 and former employees involved in this case, the disclosure of which would cause Waymo and those
25 employees substantial harm due to the high public profile of this litigation. Exhibit 6 (entire
26 document) additionally contains details regarding Anthony Levandowski's compensation and payroll,
27 which Waymo maintains as confidential

